

Scott E. Gizer, Esq., Nevada Bar No. 12216
sgizer@earlysullivan.com
Sophia S. Lau, Esq., Nevada Bar No. 13365
slau@earlysullivan.com
EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP
8716 Spanish Ridge Avenue, Suite 105
Las Vegas, Nevada 89148
Telephone: (702) 331-7593
Facsimile: (702) 331-1652

Kevin S. Sinclair, Nevada Bar Number 12277
ksinclair@sinclairbraun.com
SINCLAIR BRAUN LLP
16501 Ventura Boulevard, Suite 400
Encino, California 91436
Telephone: (213) 429-6100
Facsimile: (213) 429-6101

**Attorneys for Defendant
FIDELITY NATIONAL TITLE INSURANCE COMPANY**

**DESIGNATED LOCAL COUNSEL FOR SERVICE OF
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)**

Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
Las Vegas, Nevada 89121

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JPMORGAN CHASE BANK, N.A.

Plaintiff,

VS.

FIDELITY NATIONAL TITLE GROUP,
INC., et al..

Defendants.

Case No.: 2:20-cv-02188-APG-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND [ECF No. 10] AND MOTION
FOR FEES AND COSTS [ECF No. 11]**

(First Request)

1 Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff JPMorgan
 2 Chase Bank N.A.’s (“JPMorgan”) (collectively, the “Parties”), by and through their counsel of
 3 record, hereby stipulate and agree as follows:

- 4 1. On December 1, 2020, JPMorgan filed its Complaint in the Eighth Judicial District
 Court, Case No. A-20-825633-C [ECF No. 1-1];
- 5 2. On December 1, 2020, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
- 6 3. On December 31, 2020, JPMorgan filed a Motion for Remand [ECF No. 10];
- 7 4. On December 31, 2020, JPMorgan filed a Motion for Costs and Fees [ECF No. 11];
- 8 5. Fidelity’s deadline to respond to JPMorgan’s Motion for Remand and Motion for
 Costs and Fees is currently January 14, 2021;
- 9 6. Fidelity’s counsel is requesting an extension until Thursday, January 28, 2021, to file
 its response to the pending Motion for Remand and Motion for Costs and Fees;
- 10 7. Fidelity requests a brief extension of time to respond to the Motion for Remand and
 Motion for Costs and Fees to afford Fidelity additional time to respond to the legal
 arguments set forth in JPMorgan’s motions;
- 11 8. JPMorgan does not oppose the requested extension;
- 12 9. This is the first request for an extension which is made in good faith and not for
 purposes of delay;

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1 **IT IS SO STIPULATED** that Fidelity's deadline to respond to JPMorgan's Motion for
2 Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended through
3 and including January 28, 2021.

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5 Dated: January 12, 2021

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

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7 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
8 Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY

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10 Dated: January 12, 2021

SINCLAIR BRAUN LLP

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12 By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
13 Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY

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15 Dated: January 21, 2021

WRIGHT FINLAY & ZAK, LLP

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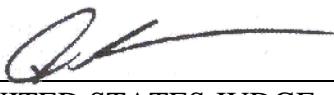
17 By: /s/-Lindsay D. Robbins
LINDSAY D. ROBBINS
18 Attorneys for Plaintiff WELLS FARGO
BANK, N.A.

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20 **IT IS SO ORDERED:**

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22 Dated: January 12, 2021

By: 
UNITED STATES JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filling to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden
D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP